

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., VOLVO
TRUCKS NORTH AMERICA, INC.,
KOMATSU AMERICA CORP.,
CATERPILLAR INC., HYUNDAI
CONSTRUCTION EQUIPMENT
AMERICAS, INC., TOPCON TIERRA,
STARTRAK SYSTEMS, LLC, WIRELESS
MATRIX USA, LLC, JLG INDUSTRIES
INC., TYLER TECHNOLOGIES, INC.,
GEOTAB, INC., and NAVISTAR, INC.,

Defendants.

Case No. 6:10-CV-00327-LED

JURY TRIAL DEMANDED

**DEFENDANT TOPCON TIERRA'S AND PLAINTIFF INNOVATIVE GLOBAL
SYSTEMS LLC'S AGREED MOTION TO EXTEND DEADLINE TO
COMPLY WITH P.R. 3-3 AND DISCOVERY ORDER 2**

Defendant Topcon Tierra (“Tierra”) and Plaintiff Innovative Global Systems, LLC (“IGS”) file this agreed motion to extend Tierra’s deadline to comply with P.R. 3-3 and Discovery Order 2(B) [Docket Number 164] and any obligation of IGS to comply with Discovery Order 2(B) and (C) with respect to Tierra as follows:

Topcon Tierra requests that its deadline to comply with P.R. 3-3 and Discovery Order 2(B) be extended through and including February 14, 2011. IGS requests that any deadline for it to comply with Discovery Order 2(B) and (C) as to Tierra be extended through and including the same date. The purpose of this extension is to determine whether the ongoing negotiations regarding a resolution of Plaintiffs’ claims can be brought to fruition. Tierra and IGS agree to the requested relief.

Date: February 4, 2011

Respectfully submitted,

/s/ Allen F. Gardner

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(with permission by Allen F. Gardner)

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 4, 2011. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Allen F. Gardner _____
Allen F. Gardner